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June 26, 2024

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: In re Extradition of Steven Lee, Mag No. 23-9089

Dear Judge Waldor:

As the Court is aware, this Firm represents Respondent Steven Lee in the above-captioned matter, which is currently pending before Your Honor. We write with regard to Mr. Lee's conditions of release, and specifically to request that his current conditions be slightly modified to permit Mr. Lee to take walks outside his home to further his cardiac rehabilitation after major open-heart surgery.

By way of brief reminder, in March 2023, Mr. Lee was arrested and released on bail subject to certain conditions, including a \$10,000,000 bond, co-signed by his son, Jonathan Lee, and secured by the residence of his brother, Jason Lee. Both of his sons have surrendered their passports as further security to guarantee his appearance. As the Court may also recall, Mr. Lee suffered a heart attack in mid-October and underwent emergency open-heart quadruple bypass surgery. His GPS ankle monitor had to be removed so that doctors could harvest veins from one or more of his legs in order to utilize them in the course of operating on his heart, and his medical team requested that the ankle bracelet not be reapplied during the course of his cardiac rehabilitation. With the Government and Pretrial's consent, the Court has modified Mr. Lee's conditions of release to remove the ankle monitor requirement for the duration of this case.

In light of Mr. Lee's continuing recovery and his need to increase his mobility and stamina following surgery, he most respectfully requests that the conditions of his release be modified to permit him to take walks within a three mile radius of his home as approved by the Office of Pretrial Services. We have consulted with Mr. Lee's Pretrial Services Officer, Stephen Griggs, who has agreed to the proposed relief and graciously offered to work with Mr. Lee on a regular schedule for these walks. We have also consulted with Assistant U.S. Attorney Carolyn Silane, who has advised that the Government defers to Pretrial on this matter. If the foregoing meets with Your Honor's approval, we would respectfully request that the Court execute the proposed consent order which is provided herewith for the convenience of the Court. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact us. We thank the Court for its very kind consideration of this request.

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Respectfully submitted,

s/ Anne M. Collart

Anne M. Collart, Esq.

s/ Lawrence S. Lustberg

Lawrence S. Lustberg, Esq.